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February 6, 2002

Mr. William Caton
Acting Secretary
Federal Communications Commission
455 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Presentation, IB Docket No. 98-21

Dear Mr. Caton:

On February 5, 2002, Ben Griffin and the undersigned, representing R/L DBS Company, LLC, met with Bryan Tramont and Stacy Robinson, legal advisors to Commissioner Abernathy.

The purpose of the meeting was to discuss certain issues in the pending rulemaking on Part 100 rules for the direct broadcast satellite ("DBS") service, IB Docket No. 98-21. We discussed the background of R/L DBS and its progress towards launch of its satellite and the commencement of service. With respect to certain issues in IB Docket No. 98-21, we expressed the view that there should be no cable cross-ownership restrictions, restrictions on foreign ownership of subscription DBS service providers, and new geographic service requirements imposed other than those currently in the rules. We also discussed the process for assigning DBS channels that currently are vacant.

Pursuant to sections 1.1206(b)(1) and (b)(2) of the Commission's rules, an original and one copy of this letter are being filed with the Office of the Secretary. Copies of this letter are also being served on the Commission personnel who participated in these meetings via electronic mail. Any questions concerning this submission should be addressed to the undersigned.

Sincerely,

Christopher R. Bjornson

cc: Ms. Stacy Robinson
Mr. Bryan Tramont

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